

UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW HAMPSHIRE

_____	*	
UNITED STATES OF AMERICA,	*	
Plaintiff	*	
	*	
v.	*	CASE NO.: 1:16-cr-00058-JL-1
	*	
FELIPE REYES EDUARDO	*	
Defendant	*	
_____	*	

ASSENTED TO MOTION TO CONTINUE TRIAL

Now comes the Defendant in the above-captioned matter, Felipe Reyes Eduardo, by and through his attorney, William R. Sullivan, Jr. and requests that this Honorable Court continue the final pretrial hearing and trial in this matter, now scheduled for June 30 and July 6, 2016, respectively, for sixty (60) days.

As reasons for this request, defense counsel states the following:

1. The parties are attempting to schedule a safety-valve conference and are in the process of coordinating dates between the parties and agents and will need more time in order to complete the process.
2. It is anticipated that the Defendant will enter a change of plea after the safety-valve conference.
3. Defense counsel has spoken with Assistant U.S. Attorney William Morse, who has assented to a continuance.
4. Counsel has spoken with his client, Felipe Reyes Eduardo, who has previously signed a Waiver of Speedy Trial, filed on or about April 27, 2016.

Wherefore, the Defendant respectfully requests that this Honorable Court continue the final pretrial hearing and trial in this matter for a period of 60 days.

Date: May 31, 2016

Respectfully submitted,  
Defendant,  
By his attorney,

/s/ William R. Sullivan, Jr.  
William R. Sullivan, Jr.  
Sullivan & Sullivan  
25 Railroad Square, Suite 405  
Haverhill, MA 01832  
(978) 521-6801

CERTIFICATE OF SERVICE

I, William R. Sullivan, Jr., do hereby certify that the above Assented to Motion to Continue has on this 31<sup>st</sup> day of May, 2016 been served on all parties or their attorneys of record via electronic filing.

/s/ William R. Sullivan, Jr.  
William R. Sullivan, Jr.